

1 Scott A. Kronland (SBN 171693)
2 Stacey M. Leyton (SBN 203827)
3 Eileen B. Goldsmith (SBN 218029)
4 Danielle E. Leonard (SBN 218201)
5 Robin S. Tholin (SBN 344845)
6 James Baltzer (SBN 332232)
7 ALTSHULER BERZON LLP
8 177 Post Street, Suite 300
9 San Francisco, CA 94108
10 Tel. (415) 421-7151
11 Fax (415) 362-8064
12 skronland@altber.com
13 sleyton@altber.com
14 egoldsmith@altber.com
15 dleonard@altber.com
16 rtholin@altber.com
17 jbaltzer@altber.com

Attorneys for Plaintiffs

[Additional Counsel not listed]

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-CIO;
AMERICAN FEDERATION OF STATE
COUNTY AND MUNICIPAL EMPLOYEES,
AFL-CIO, et al.,

Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL
MANAGEMENT, et al.,

Defendants.

Case No. 3:25-cv-01780-WHA

**PLAINTIFFS' NOTICE OF
DEPOSITION OF JUSTIN
FULCHER**

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that, pursuant to Federal Rules of Civil Procedure 26 and 30, Plaintiffs, by and through undersigned counsel, will take the deposition of Justin Fulcher on **March 11, 2025 at 2:00 p.m. PST** at 80 F Street, NW, Washington, DC 20001, as agreed upon by the parties. The deposition will be taken before a person authorized by law to administer oaths under Federal Rules of Civil Procedure 28(a) and shall continue from one day to the next, excluding Sundays and holidays, until the examination is completed.

Plaintiffs intend and reserve the right to record the deposition testimony of Justin Fulcher by videotape and instant visual display, in addition to recording the testimony stenographically and via LiveNote/Realtime, and further intend and reserve the right to provide a secure live internet, video, audio and/or telephonic stream for parties and counsel of record. Plaintiffs reserve the right to use the videotape deposition at the time of trial

1 DATED: March 6, 2025

2 Scott A. Kronland
3 Stacey M. Leyton
4 Eileen B. Goldsmith
5 Danielle E. Leonard
6 Robin S. Tholin
7 James Baltzer
8 ALTSHULER BERZON LLP
9 177 Post St., Suite 300
10 San Francisco, CA 94108
11 Tel: (415) 421-7151

12 By: /s/ Danielle E. Leonard
13 Danielle E. Leonard

14 *Attorneys for Plaintiffs*

15 Norman L. Eisen (*pro hac vice forthcoming*)
16 Pooja Chadhuri (SBN 314847)
17 STATE DEMOCRACY DEFENDERS
18 FUND
19 600 Pennsylvania Avenue SE #15180
20 Washington, DC 20003
21 Tel: (202) 594-9958
22 Norman@statedemocracydefenders.org
23 Pooja@statedemocracydefenders.org

24 By: /s/ Norman L. Eisen

25 *Attorneys for Plaintiffs*

26 Rushab Sanghvi (SBN 302809)
27 AMERICAN FEDERATION OF GOVERNMENT
28 EMPLOYEES
80 F Street, NW
Washington, DC 20001
Tel: (202) 639-6426
Sanghr@afge.org

By: /s/ Rushab Sanghvi

*Attorneys for Plaintiff American Federation of
Government Employees (AFGE)*

1 Teague Paterson (SBN 226659)
2 Matthew Blumin (*pro hac vice forthcoming*)
3 AMERICAN FEDERATION OF STATE, COUNTY,
4 AND MUNICIPAL EMPLOYEES
5 1625 L Street, N.W.
6 Washington, D.C. 20036
7 Tel: (202) 775-5900
8 Tpaterson@afscme.org
9 MBlumin@afscme.org

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
By: /s/Teague Paterson

*Attorneys for Plaintiff American Federation of State
County and Municipal Employees (AFSCME)*

1 **PROOF OF SERVICE**

2 I am employed in the City and County of San Francisco, California. I am over the age of
3 eighteen years and not a party to the within action; my business address is 177 Post Street, Suite 300,
4 San Francisco, California 94108. On March 6, 2025, I served the following document(s):

5 **PLAINTIFFS' NOTICE OF DEPOSITION OF JUSTIN FULCHER**

6 on the parties, through their attorneys of record, as designated below:

7 **By Electronic Service:** By Email, I caused such document(s) to be served via electronic mail on the
8 parties in this action by transmitting true and correct copies to the following email address(es):

9 KELSEY J. HELLAND
10 Assistant United States Attorney
11 450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
kelsey.helland@usdoj.gov

12 I declare under penalty of perjury under the laws of the State of California that the foregoing
13 is true and correct. Executed March 6, 2025, at San Francisco, California.

14
15 /s/ Giorgia Lingardi
16 Giorgia Lingardi
17
18
19
20
21
22
23
24
25
26
27
28